

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

| | | |
|--------------------------------------|---|-------------------------------------|
| BRUCE E. KATZ, M.D., P.C., | : | |
| individually and on behalf of others | : | |
| similarly situated, | : | CIVIL ACTION NO. 1:21-cv-6969 (AJN) |
| Plaintiff, | : | |
| | : | |
| vs. | : | |
| | : | |
| CAROLINA LIQUID CHEMISTRIES, CORP. | : | |
| | : | |
| Defendant. | : | |
| | : | |

NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendant Carolina Liquid Chemistries Corp. (“CLC”) will move this Court before the Honorable Allison J. Nathan, United States District Court Judge, at the United States Courthouse, 40 Foley Square, New York, New York 10007, for an Order dismissing the Complaint filed by Plaintiff Bruce E. Katz, M.D., P.C. (“Plaintiff”) with prejudice pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and granting all other relief that this Court deems just and proper.

This Motion is based on this Notice of Motion and the accompanying Memorandum of Law as well as the pleadings and other documents filed in this action.

Respectfully Submitted, this the 15th day of October 2021.

/s/ Walter C. Holton, Jr.
Walter C. Holton, Jr. (*pro hac vice*)
NCSB# 12698
HOLTON LAW FIRM, PLLC
857 W. Fifth Street
Winston-Salem, NC, 27101
(336) 777-3480
wholton@walterholton.com
Attorney for Defendant

/s/ Cheryl D. Andrews
Cheryl D. Andrews (*pro hac vice*)
NCSB# 37584
HOLTON LAW FIRM, PLLC
857 W. Fifth Street
Winston-Salem, NC 27101
(336) 777-3480
candrews@walterholton.com
Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on October 15, 2021, I caused to be electronically filed the foregoing document with the Clerk of the Court via CM/ECF. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing systems. Parties may access the filing through the Court's CM/ECF System.

/s/ Cheryl D. Andrews
Cheryl D. Andrews (*pro hac vice*)
NCSB# 37584
HOLTON LAW FIRM, PLLC
857 W. Fifth Street
Winston-Salem, NC, 27101
(336) 777-3480
candrews@walterholton.com
Attorney for Defendant